

This is in response to the Final Office Action mailed July 7, 2003.

REMARKS

Claims 54-56 and 62-64 were rejected under 35 USC 103 based on Nakashima et al, in view of Giorgio et al and Helma et al. Applicants respectfully traverse this rejection based on the following:

Claim 54 recites a method for communicating to a host system a change in status of a subsystem coupled to the host system. The subsystem receives a request by the host system to monitor a status of the subsystem and report a change in the status when a minimum numerical amount of the change occurs, but not report a change when no change occurs or less than the minimum numerical amount of change occurs. The request specifies the minimum numerical amount of the change. In response to the receiving step, the subsystem monitors status of the subsystem. If the minimum numerical amount of the change subsequently occurs in the status, the subsystem reports the change to the host system, but does not report a change when no change occurs or less than said minimum numerical amount of change occurs.

Thus, claim 54 recites that a change in status is reported when a minimum numerical amount of change in the status occurs, and that the host system specifies this minimum numerical amount. Nakashima et al. disclose polling and asynchronous reporting of status information messages, i.e. traps. However, Nakashima et al. do not disclose or suggest that a change in status is not reported until a numerical minimum change in status has occurred. Nakashima et al. also do not disclose that the numerical minimum is specified by the host computer. Therefore, two features of claim 54 are not taught by Nakashima et al. Neither feature would have been obvious in view of Nakashima et al. because Nakashima et al. are concerned with the occurrence of **events** such as the occurrence of faults or configuration changes:

"This status message T, serving as a "trap" defined in the SNMP specification, delivers event information such as faults or configuration changes occurred in the monitored controllers." Nakashima et al. Column 4 lines 44-46.

These types of events are not quantified; they either occur or do not occur. So, there are no numerical minimums to specify, no need for the host computer to specify them, and no suggestion in Nakashima et al. to consider numerical minimums. Therefore, claim 54 was not obvious in view of Nakashima et al.

Giorgio et al. also disclose the reporting of **events** such as reset, power on, power off or removal of a storage media from a controller:

"SCSI is an intelligent protocol whereby bus sequences and target/initiator conditions are monitored. There are a number of conditions designated as UNIT ATTENTION. It will be described using target 24a although it is to be understood it is the same for all targets 24a-g. These UNIT ATTENTION conditions exist when the controller 10 or an SCSI target 24a is reset, power to a target controller 10 is cycled from OFF to ON or from ON to OFF, or media has been removed and replaced within the internal controller of target 24a." Column 4 lines 58-67.

So, in Giorgio et al., there are no numerical minimums to specify, no need for the host computer to specify them, and therefore no suggestion to consider numerical minimums. Therefore, claim 54 was not obvious in view of Giorgio et al. Moreover, because these two features of claim 54 are absent from both Nakashima et al. and Giorgio et al. and no suggestion in either Nakashima et al. or Giorgio et al. for these features, these features would not have been obvious in view of the combination of Nakashima et al. and Giorgio et al.

The Examiner acknowledges the gap of Nakashima et al. and Giorgio et al., "Nakashima et al. in view of Giorgio et al. does not teach reporting to said host system a change in said status when a minimum numerical amount of said change occurs." However, the Examiner cites Helma et al. as filling this gap. Applicants respectfully disagree.

Helma et al. teach a radar transmitter and a reflector to determine when a person or other object is in a hazardous area such as a railroad crossing (between the transmitter and reflector). In such a case, the radar signal transmitted by the transmitter, reflected by the reflector, and received back at the transmitter will be attenuated, because it was intercepted by the person or other object in between. But, unlike claim 54, Helma et al. do not teach "said subsystem monitoring **status of said subsystem**, and if said minimum numerical amount of said change subsequently occurs in said status, said subsystem reporting said change to said host system." Instead, Helma et al. teach the detection of an object between the radar transmitter and the reflector. Helma et al. do not teach monitoring the status of the reflector. Therefore, Helma et al. do not fill the gap left by Nakashima et al. and Giorgio et al., and the rejection under 35 USC 103 should be withdrawn.

Moreover, Helma et al. are non analogous art, and therefore not a proper reference to combine with Nakashima et al. and Giorgio et al or cite against the present invention. The present invention pertains to a host system and subsystem in which the host system makes requests to the subsystem (about status of the subsystem), and the subsystem responds to the requests. In contrast, Helma et al. pertain to a radar station and reflector for detecting the presence of a person or other object in a hazardous area such as a railroad crossing. A person reasonably skilled in the art to which the present invention pertains would not think to look in the radar art. Moreover, Nakashima et al. pertain to a network monitoring station and Giorgio et al. pertain to a computer system, so there would be no suggestion or motivation to combine Nakashima et al. or Giorgio et al. with Helma et al. which is in the radar art.

Dependent claims 59, 60 and 61 (and 67, 68 and 69) with their recitations of SCSI and SAF-TE are even further afield from Helma et al.

Claims 62-69 distinguish over the cited art for the same reasons that claims 54-61 distinguish thereover, and Helma et al. is non analogous art against claims 62-69 for the same reasons as claim 54-61.

Based on the foregoing, independent claim 54 and its dependent claims 55-61 should be allowable, and independent claim 62 and its dependent claims 63-69 should be allowable as well.

Claims 70, 71, 78-80 and 87 were rejected under 35 USC 103 based on Nakashima et al. in view of Giorgio et al.

Claim 70 recites a computer system comprising a host system and a subsystem coupled to the host system. The subsystem receives a request by the host system to monitor a status of the subsystem and report a change in the status when the change occurs or in absence of the change during a predetermined period following the request, report no change in the status, but not reporting lack of change of the status before the predetermined period lapses. In response to the receiving step, the subsystem monitors status of the subsystem. If a change occurs in the status before the predetermined period lapses, the subsystem reports the change in status to the host system, wherein before the change occurs, the subsystem not reporting the status of the subsystem to the host system. If a change does not occur in the status before the predetermined period lapses, the subsystem reports no change in the status upon lapse of the predetermined period.

Thus, claim 70 recites that the subsystem receives a request by the host system to monitor a status of the subsystem and report a change in the status when the change occurs or in absence of the change during a predetermined period following the request, report no change in status, but not reporting lack of change of the status before the predetermined period lapse. None of the cited art teaches this feature of claim 70.

Nakashima et al. teach SNMP traps. The traps of Nakashima et al. are not generated in the absence of an event. Moreover, the traps of Nakashima et al. are not generated during a predetermined period from when the request is made. Likewise, Giorgio et al. disclose traps with the same limitations as those of Nakashima et al. The foregoing feature of claim 70 would not have been obvious in view of the traps of Nakashima et al. and Giorgio et al. because there is no

suggestion of this feature. It is inconsistent with the traditional concept of a "trap" to generate it when nothing happens.

Nakashima et al. also teach polling:

"In a polling-based system, the network monitoring station collects status information from ATM network devices by transmitting query messages at regular intervals to request them to send back their local administrative information, including device configuration, functional status, and statistics. The network monitoring station then detects configuration changes and/or status changes by comparing the present information with the previous information."

Column 1 lines 42-49.

However, each poll/request solicits a response as to the status of the network device at the time the poll/request is received. There is no suggestion or teaching Nakashima et al. that upon receipt of the poll, the network device delays its status report such that if a change occurs in the status before a predetermined period lapses, the subsystem reports the change in status to the host, but delays its status report for the predetermined period if no change has occurred since the last request. Therefore, Nakashima et al. fail to teach the following element of claim 70:

"if a change occurs in said status before said predetermined period lapses, said subsystem reporting said change in status to said host system, and wherein before said change occurs, said subsystem not reporting said status of said subsystem to said host system; and

if a change does not occur in said status before said predetermined period lapses, said subsystem reporting no change in said status to said host system upon lapse of said predetermined period."

The foregoing elements of claim 70 would not have been obvious in view of Nakashima et al. because it is counter to the concept of polling. A poll seeks a prompt response as to current status. Therefore, new claim 70, and its dependents 71-78 should be allowable..

Independent claim 79 and dependent claims 80-87 distinguish over the prior art for the same reasons that claims 70-78 distinguish thereover.

Based on the foregoing, the present patent application as amended above should be allowed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Arthur Samodovitz', written in a cursive style.

Arthur Samodovitz
Reg. No. 31,297